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Attorneys for Defendant HARRAH'S ENTERTAINMENT, INC.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

JAMES M. KINDER,
Plaintiff,

vs.

HARRAH'S ENTERTAINMENT, INC. and
DOES 1 through 100, inclusive,
Defendants.

CASE NO. 07-CV-2132-DMS (AJB)
[Consolidated with 07 CV 2226 DMS (POR)]

Judge: Hon. Dana M. Sabraw
Mag. Judge: Hon. Anthony J. Battaglia

Action Date: October 2, 2007

DEFENDANT HARRAH'S
ENTERTAINMENT, INC.'S NOTICE OF
MOTION AND MOTION TO DECLARE
PLAINTIFF A VEXATIOUS LITIGANT
AND FOR AN ORDER REQUIRING
PLAINTIFF TO POST A BOND IN THE
AMOUNT OF \$75,000

ACCOMPANYING DOCUMENTS:
MEMORANDUM OF POINTS AND
AUTHORITIES; MEMORANDUM OF
POINTS AND AUTHORITIES;
DECLARATION OF RONALD R. GIUSSO;
[PROPOSED] ORDER

Date: April 18, 2008
Time: 1:30 p.m.
Courtroom: 10

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1 TO PLAINTIFF AND HIS ATTORNEY OF RECORD:

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3 NOTICE IS HEREBY GIVEN that on April 18, 2008, at 1:30 p.m. in Courtroom 10 of the
4 above-entitled Court, located at 880 Front Street, San Diego, California 92101-8900, Defendant
5 HARRAH'S ENTERTAINMENT, INC. will move this Court for (1) an Order Declaring Plaintiff
6 James M. Kinder a Vexatious Litigant and (2) an Order Requiring Plaintiff James M. Kinder to
7 Post a Bond in the Amount of \$75,000.

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9 This motion is based on this notice of motion, the memorandum of points and authorities,
10 the declaration of Ronald R. Giusso, the notice of lodgment of exhibits filed herewith, the
11 pleadings and papers on file herein, and upon such other matters as may be presented to the Court
12 at the time of the hearing.

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14 SHEA STOKES ROBERTS & WAGNER, ALC

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16 Dated: March 6, 2008

By: s/Maria C. Roberts

Maria C. Roberts
Ronald R. Giusso
Attorneys for Defendant
HARRAH'S ENTERTAINMENT, INC.